

1 John L. Smaha, Esq., Bar No. 95855  
2 Gustavo E. Bravo, Esq., Bar. No. 218752  
3 SMAHA LAW GROUP  
4 2398 San Diego Avenue  
5 San Diego, California 92110  
6 Telephone: (619) 688-1557  
7 Facsimile: (619) 688-1558

8 Attorneys for Debtor, Dana Aaron Linett

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**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

In re

DANA AARON LINETT,

Debtor.

CASE NO. 19-05831-LA11

Chapter 11

STATUS REPORT FOR STATUS  
CONFERENCE AND VARIOUS  
OTHER MATTERS

DATE: May 6, 2021

TIME: 2:00 p.m.

DEPT.: Two

JUDGE: Hon. Louise DeCarl Adler

19 The Debtor, Dana Aaron Linett (the "Debtor") respectfully submits the following Status  
20 Report. As the Court is aware, the Debtor has previously filed various status conference reports  
21 and has updated the Court regarding the various reporting and administrative requirements  
22 required of the Debtor on filing a chapter 11 bankruptcy. The only matters still pending are the  
23 Debtor's operating reports. As of today, the Debtor is current on all operating reports, having  
24 timely filed its March report prior to April 20, 2021. In addition, the Debtor is informed and  
25 believes that he is current on U.S. Trustee's Fees. Finally, the Debtor believes he continues to  
26 be current on the support payments that he continues to be obligated to make under the cash  
27 collateral order entered by this Court.

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1 In the meantime, the Debtor has been in ongoing discussions with Barbara Linett on a  
 2 potential liquidating plan. Although significant progress has been made, there are a number of  
 3 sticking points that Barbara Linett has indicated she is not willing to discuss further and is not  
 4 willing to negotiate at this point. The Debtor likewise considers Barbara Linett's position on  
 5 these points to be unacceptable. The Debtor suggested putting these issues up before the  
 6 mediator that previously attempted to work a settlement in this case, Michael Breslauer.  
 7 Unfortunately, Barbara Linett has indicated that any such mediation would be a delay that  
 8 Barbara Linett is not willing to consider.

9 Given the impasse on these certain items, Barbara Linett's counsel has informed Debtor  
 10 that it plans on proposing a plan based on the liquidating trust that has been discussed, albeit  
 11 with the conditions and requirements that she prefers with reference to the items that the parties  
 12 have reached an impasse on. In the meantime, Barbara Linett and the Debtor will continue to  
 13 attempt to reach some agreement on those terms. If an agreement cannot be reached, then the  
 14 Court may have to decide those issues that remain in dispute through the disclosure statement  
 15 and confirmation process. Debtor's counsel has been informed that Barbara Linett has obtained  
 16 a hearing date for approval of a disclosure statement for her soon to be filed amended plan.  
 17 Based on this, the Debtor would respectfully request that the Court consider moving the status  
 18 conference scheduled for May 6, 2021, along with all matters currently schedule for that day, to  
 19 the new hearing date set aside by Mr. Thomas Gorrill, as Barbara Linett's counsel, for the second  
 20 amended disclosure statement.

21 It is the Debtor's understanding that those changes that the parties are agreeable to will  
 22 be reflected in the new disclosure statement filing. U.S. Bank has also requested some changes  
 23 to the trust documents the parties have been discussing and the Debtor is informed by Mr. Gorrill  
 24 that the changes requested by U.S. Bank will be made to the operative documents under his  
 25 proposed second amended disclosure statement.

26 Dated: April 29, 2021

/s/ John L. Smaha  
 John L. Smaha, Esq.  
 Gustavo E. Bravo, Esq.  
*Attorneys for Debtor and Debtor-in-Possession,*  
 Dana Aaron Linett

John L. Smaha, Esq. Bar No. 95855  
Gustavo E. Bravo, Esq. Bar No. 218752  
**SMAHA LAW GROUP APC**  
2398 San Diego Avenue  
San Diego, California 92110  
(619) 688-1557 Telephone  
(619) 688-1558 Facsimile  
Attorneys for Debtor, Dana Aaron Linett

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**PROOF OF SERVICE**

Case No. 19-05831-LA11

In re Dana Aaron Linett

I am employed in the City of San Diego, California. I am over the age of 18 and not a party to the within action. My business address is 2398 San Diego Avenue, San Diego CA 92110.

On April 29, 2021, I caused to be served the following document(s) described as:

**1. STATUS REPORT FOR STATUS CONFERENCE AND VARIOUS OTHER MATTERS**

U.S. TRUSTEE  
Department of Justice  
880 Front Street, Ste. 3230  
San Diego, CA 92101

[X] (BY MAIL) I served the individual named by placing the documents in a sealed envelope. I then placed it for collection and mailing with the United States Postal Service this same day, at my address shown above, following ordinary business practice.

[X] (To Be Served by the Court via Notice of Electronic Filing ("NEF")). Under controlling Local Bankruptcy Rules(s) ("LBR"), the document(s) listed above will be served by the court via NEF and hyperlink to the document. On April 29, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the e-mail address(es) indicated and/or as checked below:

Gustavo E. Bravo: gbravo@smaha.com  
Michael D. Breslauer: mbreslauer@swsslaw.com, wyones@swsslaw.com  
Theron S Covey: tcovey@raslg.com, CAECF@tblaw.com  
Sean C Ferry: sferry@raslg.com, bkyecf@rasflaw.com; sferry@ecf.courtdrive.com  
Thomas B. Gorrill: tom@gorillalaw.com, r53431@notify.bestcase.com  
Michael Koch: MLKoch@live.com, lblaw7@gmail.com; r40511@notify.bestcase.com  
Byron B. Mauss: bmauss@swlaw.com, idelgado@swlaw.com

1       **David Ortiz:**       david.a.ortiz@usdoj.gov,  
2                       USTP.REGION15@USDOJ.GOV;tiffany.l.carroll@usdoj.gov;abram.  
3       **John Smaha:**       s.feuerstein@usdoj.gov  
4                       jsmaha@smaha.com,  
5       **U.S. Trustee:**       gbravo@smaha.com;mdawson@smaha.com;jteague@smaha.com  
6                       ustp.region15@usdoj.gov

7       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
8       true and correct. Executed on **April 29, 2021**, San Diego, California.

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      /s/ Amelda M. Dawson  
      Amelda M. Dawson

